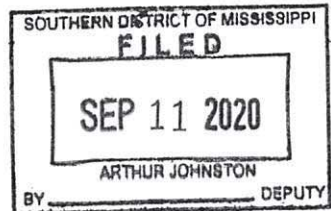


FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

COMPLAINT

Brooks

(Last Name) (Identification Number)

Quater & Vashon

(First Name) (Middle Name)

V.S.P. Thomson

(Institution)

Administrative United States Penitentiary, P.O. Box 1002, Thomson, IL 61285

(Address)

(Enter above the full name of the plaintiff, prisoner and address of plaintiff in this action)

V.

CIVIL ACTION NUMBER:

3:20cv599-DPJ-FKB
(to be completed by the Court)Officer HankOfficer GriffinOfficer ~~Forner~~ FornerOfficer Handy

(Enter the full name of the defendant(s) in this action)

GENERAL INFORMATION

- A. At the time of the incident complained of in this complaint, were you incarcerated?
Yes (☒) No ()
- B. Are you presently incarcerated?
Yes (☒) No ()
- C. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?
Yes (☒) No ()
- D. Are you presently incarcerated for a parole or probation violation?
Yes () No (☒)
- E. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?
Yes () No (☒)
- F. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?
Yes () No (☒)

PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank.)

I. Name of plaintiff: Quater Vashon Brooks Prisoner Number: 17427-032

Address: ADMINISTRATIVE United States Penitentiary
P.O. Box 1002
Thomson, IL 61285

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions and places of employment of any additional defendants.)

II. Defendant: Officer Hank is employed as ~~correctional officer~~
correctional officer at U.S.P. Yazoo

The plaintiff is responsible for providing his/her address and in the event of a change of address, the new address of plaintiff as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

PLAINTIFF:

NAME:

Quater Brooks

ADDRESS:

ADMINISTRATIVE United States Penitentiary
P.O. Box 1002. Thomson, IL 61285

DEFENDANT(S):

NAME:

Officer Hank

ADDRESS:

U.S.P. YazooOfficer GriffinU.S.P. YazooOfficer FornerU.S.P. YazooOfficer HandyU.S.P. Yazoo

OTHER LAWSUITS FILED BY PLAINTIFF

NOTICE AND WARNING

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any lawsuits in a court of the United States? Yes () No (X)
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse of this page or additional sheets of paper.)

CASE NUMBER 1.

1. Parties to the action: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____
4. Name of judge to whom case was assigned: _____
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) _____

CASE NUMBER 2.

1. Parties to the action: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____
4. Name of judge to whom case was assigned: _____
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) _____

STATEMENT OF CLAIM

- III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet(s) if necessary).

I was sexually abused my first month at Yazoo U.S.P. by officer Hardy. I was afraid that if I told some one that my life would be in danger. officer Hardy continue to make advancements towards me so I check in on Protective custody and made a complaint, and all hell broke ~~loose~~ loose.

RELIEF

- IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

I would like all Parties to be handled accordingly to the B.O.P Policy and I would like a jury trial. I would also like 5 million dollars for the abuse I received

Signed this 9 day of 3, 20 20.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Signature of plaintiff

Page: 2 of 4, II Defendant - Continued

Defendant: Officer Griffin is employed as correctional officer at
U.S.P. Yazoo

Defendant: Officer Forman is employed as correctional officer at
U.S.P. Yazoo

Defendant: Officer Handy is employed as correctional officer at
U.S.P. Yazoo

Name: Quatez V. Brooks
Reg No. 17427-032

Page: 4 of 4 III
Continued

§ 8. Basis of Claim Continued:

① On August 1, 2018, I submitted "cop-outs" to the Captain, Lieutenant ("LT"), and Associate Warden ("AW") Carlton, informing them that I was receiving threats from staff, and that staff was also telling my cellie that they would pay him 50 Flatbooks of stamps (stamps being prison currency) to assault me by punching me in the mouth. The staff making these threats were ^{(b)(6); (b)(7)(C)} Officer, Hank, Formen, Griffen, & Handy. These officers were going to every range and telling the inmates that I was a "switch" and that I switched on both inmates and staff.

The reason these officers began to do these things is because I reported officer ^{(b)(6); (b)(7)(C)} Handy for sexually assaulting me. Then officer ^{(b)(6); (b)(7)(C)} Griffen told me that if I come to recreation, he would have me assaulted.

② So on August 2, 2018, I wrote a complaint ("copout") to AW Carlton about these actions of staff, and I hand delivered it to him at the time he did his round in the Special Housing Unit ("SHU"). He told me that he would look into my complaint.

page 2 of 5

Page: 4 of 4 III Federal Tort Claim Continued:

(3) On August 3, 2018, (b)(6); (b)(7)(C) L.T. Hill took me into his office to speak with me. At the conclusion of our conversation (b)(6); (b)(7)(C) L.T. Hill escorted me outside and placed me in a rec cage with another inmate. He then left the area. Then officer (b)(6); (b)(7)(C) Griffin walked past the recreation cage and told me "I got something for you." Approximately 15 minutes later officer (b)(6); (b)(7)(C) Griffin pulled a hispanic gang member from another cage, and placed him in the rec cage with me. Officer (b)(6); (b)(7)(C) Griffin knew that I was on protective custody status and that the other inmate would assault me if placed in the same rec cage. And so the other inmate began to assault me. I got into a ball position and tried to protect myself while the other inmate continued to assault me. I did not try to fight back. I just tried to protect myself from being too seriously injured.

Other officers then ran to the rec cage and told the other inmate to stop assaulting me, but he did not stop. The officers then used force to prevent the other inmate from continuing to assault me. I was then put in a holding cell where officer (b)(6); (b)(7)(C) Griffin came by and said "I told you they was going to get you."

After the assault I was seen by medical staff, but at that time I had a bruise in my face and eyes. The following day I began to submit requests for medical assistance because my body felt very weak and I felt

Page: 4 of 4 III. Federal ~~Court~~ Claim Continued:

dizzy. My vision was blurry and my head was swollen. I had three knots on my head. I sent copouts to AWW Carlton, the Captain, Psychology, and medical. I submitted these copouts on paper and electronically. But I received no response, and medical staff did not come to check on me.

④ On August 9, 2018, my cellie went out to recreation and he informed staff of my condition and requested that they contact medical staff. But they did not. When my cellie returned from rec I was cuffed, and then I passed out. I was coming in and out of consciousness and I heard officer (b)(6); (b)(7)(C)
Foreman say "Brooks, I hope your stupid ass dies cause I aint calling nobody." My cellie then kicked on the cell door and pushed the emergency button, but to no avail. Staff walked passed the cell door and ignored me. I was left in the cell unresponsive with handcuffs on (my cellie had no handcuffs on) for about an hour and 20 minutes.

Once shift changed officer (b)(6); (b)(7)(C)
Harky came to do the count, and he called medical. I was then evaluated and taken to an emergency room at the outside hospital. Medical staff at the hospital pumped me with multiple bags of fluids, prescribed medication, and placed me on a liquid diet. When I was returned from the hospital I was placed in the FCI SHU, and I was told that it was for my protection from officers.

Page 4 of 4 III Federal ~~Claim~~ Claim Continued:

⑤ I then came back from the FCI and I was placed in the 5H1 Cell with an active gang member while on protective custody status.

On September 11, 2018, I informed officer (b)(6); (b)(7)(C)
Hank that I was not suppose to be in the cell with this active gang member, my life was in danger, and that I needed to be moved. But I was not moved, and later this same day, the gang member assaulted me. I can't remember what happened exactly. I woke up in medical and there was blood everywhere. I asked "what happened" and was told "your cellie beat the shit out of you." My face was cut, my head had a knot on it, and my whole body was in pain.

Since these two assaults my vision has gotten extremely worst. When I stand or sit down I get lightheaded, sometimes for long periods of time.

The nurse told me that this can last up to five years or a lifetime, and caused by usually head injuries. Also, I do not sleep well anymore. I wake up in cold sweats sometimes and have nightmares I never had before. I do not eat like I use to, and I get very depressed and want to hurt myself. My right hand also seems to have a continuing injury to it. It swells up and cannot be used.

Federal ~~CA~~ Claim Attachments:

A. Medical Records (RE: Quatez Brooks #17421-032)

FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983
 IN THE UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

COMPLAINT

Brooks 17427-032

(Last Name) (Identification Number)

Quatez VASHON

(First Name) (Middle Name)

Federal Correctional Institution McKean

(Institution)

P.O. Box 8000 Bradford, PA 16701

(Address)

(Enter above the full name of the plaintiff, prisoner and address of plaintiff in this action)

V.

CIVIL ACTION NUMBER: _____

(to be completed by the Court)

Officer Handy

Officer Griffin

Officer Foreman

Officer Hank

(Enter the full name of the defendant(s) in this action)

GENERAL INFORMATION

- A. At the time of the incident complained of in this complaint, were you incarcerated?
 Yes (X) No ()
- B. Are you presently incarcerated?
 Yes (X) No ()
- C. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?
 Yes (X) No ()
- D. Are you presently incarcerated for a parole or probation violation?
 Yes () No (X)
- E. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?
 Yes () No (X)
- F. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?
 Yes () No (X)

PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank.)

I. Name of plaintiff: Quatez Vashon Brooks Prisoner Number: 17427-032

Address: Federal Correctional Institution McKean
P.O. Box 8000
Bradford, PA 16701

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions and places of employment of any additional defendants.)

II. Defendant: Griffin is employed as Correctional
Officer at United States Penitentiary Yazoo

The plaintiff is responsible for providing his/her address and in the event of a change of address, the new address of plaintiff as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

PLAINTIFF:

NAME: Quatez Vashon Brooks ADDRESS: FBI McKean P.O. Box 8000
Bradford, PA 16701

DEFENDANT(S):

| | |
|----------------|---|
| NAME: | ADDRESS: |
| <u>Handy</u> | <u>USP Yazoo - P.O. Box 5000 - Yazoo City, MS 39194</u> |
| <u>Griffin</u> | <u>USP Yazoo - P.O. Box 5000 - Yazoo City, MS 39194</u> |
| <u>Foremen</u> | <u>USP Yazoo - P.O. Box 5000 - Yazoo City, MS 39194</u> |
| <u>HANK</u> | <u>USP Yazoo - P.O. Box 5000 - Yazoo City, MS 39194</u> |

OTHER LAWSUITS FILED BY PLAINTIFF

NOTICE AND WARNING

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any lawsuits in a court of the United States? Yes () No (X)
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse of this page or additional sheets of paper.)

CASE NUMBER 1.

1. Parties to the action: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____
4. Name of judge to whom case was assigned: _____
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) _____

CASE NUMBER 2.

1. Parties to the action: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____
4. Name of judge to whom case was assigned: _____
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) _____

STATEMENT OF CLAIM

- III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet(s) if necessary).

① On 8-3-18 I was set up by officer P. Griffin to be assaulted by a Mexican "Tango Blast" gang member while on recreation. I was placed on "Protective Custody" for my safety, but to me filing a PREA complaint on officer Handy, a lot of staff members begin to retaliate against me. I wrote cop-out to the warden and A.W,

RELIEF

- IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

Do to the mental, emotional, physical, and sexual abuse I would like two million compensatory damages, three million punitive damages for a total of five million monetary compensation.

Signed this _____ day of _____, 20_____.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.


Signature of plaintiff

①

ATTACHMENT TO "MBS" FORMS

Page 2 of 4

II Defendant: Handy is employed as correctional officer
at united states Penitentiary Yazoo

Foremen is employed as correctional officer
at united states Penitentiary Yazoo

Hank is employed as correctional officer
at united states Penitentiary Yazoo

Page 4 of 4

III ① TO let them know that Griffin was trying to Pay me
cell mate and other inmates to assault me. On 8-3-18
I was Placed in a recreation Cage 2 with inmate
Holt. This cage had a sign on it that said "MAX 2".
Officer Griffin look at me and said I got something for
you, and went and got the "Tango Blast" member. He Placed
him in the cage with me and said "Good Luck". Once
Officer Griffin left the "Tango Blast" began to Punch
and assault me. On the 1st of August I did cop-outs
to Assistant warden Carlton telling him how Griffin was
trying to get me assaulted when I go to recreation.
Officer Griffin was the recreation officer in the S.H.U.
② Griffin told inmates that in a snitch and I work with
S.I.S. Do to the head trauma I received from the assault
I was diagnose with "Virdigo" and now on medication
for it.

② On 8-9-18 I was in my cell with my cell mate
and Pass out. I was in hand cuff and my cell mate

②

Attachment to 1983 forms

the emergency room over night. Foremen said that he hope I die for being a "Snitch".

- ③ I was sent to the FCI next to the U.S.P Yazoo and I was told it was for my protection, once I came back from the emergency room on 8-10-18, I came back to U.S.P Yazoo on 9-4-18 and was still on protective custody, but I was placed in a cell with a active gang member that was in the S.H.U for being caught with a knife. I told Officer Hank that I was not safe in this cell on 9-11-18 he told me I would be alright. On 9-11-18 after dinner I was beat in my cell unconscious and stabbed in my face by my active gang member cellmate. Officer Hank came to the door and was yelling for my cellmate to stop but he never used O.C spray and he was laughing. I woke up in medical and asked what happen and was told I was beat up and stabbed by my cellmate. About a week later that same inmate told me "it was nothing personal, he got payed by ~~staff~~ to do it". Officer Hank continuously kept coming on my range saying I was a "Snitch" and I worked with S.I.S and anybody that beat me up would receive flat-books of stamps.

- ④ A few week after I came to U.S.P Yazoo Officer Handy came into my cell and Grabed my Penis. After I continuously told him I was not interested in his sexual advances. He told me if I dont fuck with him he was going to make

3

Attachment to "1983" forms

investigation. The week before I left officer Handy was working my range in the S.H.U and I asked to speak with a L.T cause he was not suppose to be around me. Officer Handy came on the range and said Brooks is a "snitch" he tell on staff and inmates and he work for S.I.S.

- ⑤ once I got to my next spot U.S.P Allenwood I asked the S.I.S L.T what was the out come of my PREA investigation. He said that it shows that I have no PREA investigation. He called U.S.P Yazoo and asked what was up. They asked him to start it for them. He told me that they could get in big trouble for not starting the investigation for over 4 months. 7 months later I received a paper saying that not enough evidence was found.

I have done all of my administrative remedy that are required. At this moment do to the Covid-19 situation I have been in FCI Mckean in the S.H.U for 7 months with none of my papers with all the dates and time of all of these issues. So Please do not hold this against me I did this to the best of my ability.

I have the names of the people that assaulted me and I have witnesses that will vouch and say staff was trying to pay to have me assaulted. The inmate that assaulted me will also vouch and say they was paid. Also they account transaction will show. I have

4

Attachment to "1983" forms

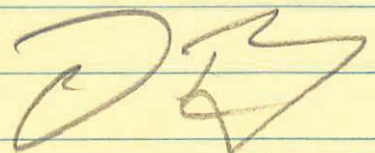
Officer Hank. That they was calling me Snitch and trying to get inmates to assault me for Pay. I have long marks across my face and body. All this have happen due to these officers deliberant indifference. I would like to sue all defendants in their individual capacity and official capacity.

Page 4 of 4

IV

I would like all the parties involved to be handed accordingly. I would also like for an investigation to be conducted about the running of the institution.

Please See "AFFIDAVIT" that is placed in with the "1983" forms, and a letter asking for representation for legal counsel.

Respectfully, 

Quater Vashon Brooks

17427-032